

HOWARD LEADER
ATTORNEY AT LAW
800 THIRD AVENUE
SUITE 2501
NEW YORK, NEW YORK 10022
TELEPHONE (646) 533-7696
FACSIMILE (646) 590-9676
E-MAIL HOWARD.LEADER@PROTONMAIL.COM

FILED VIA ECF

Hon. Jesse M. Furman
United States District Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007

October 27, 2021

United States v. Orlando CARMONA-SERRANO
(S10) 16 Cr. 387 (JMF)

Dear Judge Furman:

By Order dated October 25, 2021 (D.E. 559), the Court directed, *inter alia*, counsel to confer regarding whether and how the next status conference in this matter, currently scheduled for November 9, 2021, is to proceed.

Accordingly, this letter is to advise the Court that counsel have indeed conferred and that we seek an adjournment of approximately sixty (60) days on consent. The purpose of the request is to allow the defense additional time to review the very voluminous discovery produced by the government, as well as to obtain translations of many documents.

In conjunction with this request, we ask the Court to adjust the motion schedule previously put in place and consent to an exclusion under the Speedy Trial clock in these circumstances.

For these reasons, we ask that the status conference in this matter be adjourned until the late morning or early afternoon on a date in late January that is convenient for the Court. Counsel anticipates being out of the District the week of January 10, 2022 due to other, previously scheduled appearances in the District of Puerto Rico.

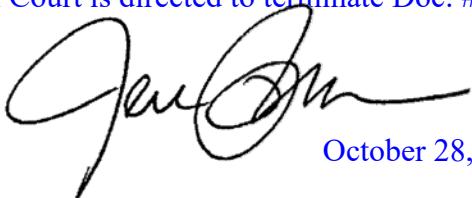
Finally, Mr. Carmona-Serrano is prepared to waive his right to attend altogether. It is counsel's understanding that the Constitution, the Federal Rules and the CARES Act so permit.

Respectfully submitted,

/s/
HOWARD LEADER

cc: Adam Hobson, Esq.,
Assistant United States Attorney (VIA ECF)

Application GRANTED. Defense motions are due by January 7, 2022. The Government shall file its opposition by January 21, 2022. Defendant shall file any reply by January 28, 2022. The pretrial conference is hereby ADJOURNED to January 20, 2022, at 3:15 p.m. Time is excluded in the interests of justice from today, October 27, 2021, until January 20, 2022, to allow the defendant and counsel to continue reviewing the discovery, to consider what if any motions should be filed, and to prepare and file those motions. The Clerk of Court is directed to terminate Doc. #561. SO ORDERED.



October 28, 2021